61074

ORIGINAL

AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

535 HERNDON PARKWAY ☐ P.O. BOX 1169 ☐ HERNDON, VIRGINIA 20172-1169 ☐ 703-689-2270
FAX 703-689-4370

August 5, 1999

U.S. Department of Transportation Dockets
Docket No. FAA-1999-5924 - 5
400 Seventh Street, SW
Room Plaza 401
Washington, DC 20590

Subject: Notice of Proposed Rulemaking on Year 2000 Airport Safety Inspections, SFAR 85

Dear Sir or Madam:

The Air Line Pilots Association (ALPA), which represents 53,000 pilots who fly for 54 U.S. and Canadian airlines, has reviewed the subject NPRM and offers the following comments. ALPA strongly supports a requirement that all airports serving Part 121 operators test their systems immediately after the beginning of the new millennium in order to ensure that all safety-related facilities and systems are available, and any problems found during such tests are made known to airlines and pilots. These functionality tests should be performed shortly after midnight on January 1, 2000, and other dates such as February 29, 2000.

We disagree with the NPRM's provision that would let airport managements delay testing past 0100 until one hour prior to the first operation on or after January 1st. This proposal fails to take into consideration the fact that there will likely be hundreds of airline aircraft in the air bound for U.S. airport destinations at and around midnight on the 1st. As such, we recommend that all such tests take place at 0100 local (or 0100 UTC depending on what clock is used by a system) in order to provide greater opportunity to (1) fix any problems before the first arrival or departure and/or (2) notify the user community of the problems that cannot be fixed prior to the first arrival or departure.

Greater advance notification of problems will help the carriers meet their schedules and reduce the likelihood that irate passengers will be stranded in airport terminals on New Years Day. It will also be an obvious safety benefit because pilots and dispatchers will have greater time to plan for any abnormalities or outages, which may well be compounded by winter weather conditions in many parts of the country. It is nearly inconceivable that some airports or ATC control towers will not have some Y2K problems that could cause diversions. Pilots need all the advance notification they can get of any such problems in order to divert in a safe and orderly manner.

The NPRM makes no mention of reporting outages to the user community (although it can be assumed that the final rule will not revise existing NOTAM and other advisory requirements). We believe that paragraph two (2) of the final rule should explicitly instruct airport operators to notify, as soon as possible, the user community of airlines and pilots via NOTAMs, ATIS and other methods concerning any outages or other problems associated with computer glitches.

Other comments:

1. If an airport's lights properly illuminate at one minute to midnight, and the lights do not fail as a result of the date rollover, then functionality has been established and a check of the lighting system should be delayed until the system cycles off at dawn. Otherwise, a check just after midnight that fails could unnecessarily cause the airport to close. FAA should determine which systems need to be checked immediately after midnight, and which systems – such as lights – can be checked at a later time.

2. FAA should require designated alternate airports to conduct the same functionality checks as other airports. Reporting requirements should be the same for these airports as well.

3. We support the suspension of the 48-hour ARFF index replacement rule. We recommend that FAA review the procedures for conducting ARFF equipment functionality checks so that the airport's ARFF index is not adversely affected. Also in this regard, it is important to recognize that some airports may have arrangements with local authorities for off-airport fire fighting equipment as a contingency plan. Off-airport vehicles must also remain operational.

Thank you for the opportunity to comment on the draft NPRM.

Sincerely,

Jerry Wright
Senior Staff Engineer
Engineering and Air Safety Department

JW:as